

EXHIBIT F

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

PATRICIA ENGLISH AND	:	
RICHARD ENGLISH, HER HUSBAND	:	
122 WEST MORTON STREET	:	
OLD FORGE, PA 18518	:	CIVIL ACTION NO.
	:	3:13-cv-00978-MEM
Plaintiffs	:	
	:	(Judge Malachy E. Mannion)
v.	:	
	:	
CROWN EQUIPMENT CORPORATION	:	
44 SOUTH WASHINGTON STREET	:	
NEW BREMEN, OHIO 45869	:	
	:	
Defendant	:	

JOINT PROPOSED VERDICT SHEET

**PLAINTIFF PATRICIA AND RICHARD ENGLISH V. CROWN EQUIPMENT
CORPORATION**

STRICT LIABILITY

- 1) Was the Crown 30SP48TT-330 stock picker defective by reason of an unreasonably dangerous design when the truck left the control of Crown?

Yes _____

No _____

(If you answered "Yes" to this question, proceed to Question 1a. If you answered "No" to this question, proceed to Question 4.)

- a) Was the design defect a substantial factor in causing Plaintiff's injury?

Yes _____

No _____

(If you answered "Yes" to this question, proceed to Question 2. If you answered "No" to this question, proceed to Question 4.)

PRODUCT MISUSE

- 2) Do you find from the preponderance of the evidence that Plaintiff misused the stock picker at the time of the accident and that Plaintiff's misuse was a substantial factor in causing her injuries?

Yes _____

No _____

(Proceed to Question 3.)

ASSUMPTION OF RISK

- 3) Do you find from the preponderance of the evidence that Plaintiff assumed the risk of injury in the operation of the stock picker at the time of the accident?

Yes _____

No _____

(Proceed to Question 4.)

NEGLIGENCE

4) Did Crown negligently design the Crown 30SP48TT-330 stock picker?

Yes _____

No _____

(If you answered "Yes" to this question, proceed to Question 4a. If you answered "No" to this question and "No" to Question 1 or Question 1a, please end your deliberations and sign the verdict form on the last page. If you answered "No" to this question and "Yes" to either Question 2 or Question 3, please end your deliberations and sign the verdict form on the last page. Otherwise, please proceed to Question 5.)

a) Was Crown's negligence a substantial factor in causing plaintiff's injury?

Yes _____

No _____

(If you answered "Yes" to this question, proceed to Question 5. If you answered "No" to this question and "No" to Question 1 or Question 1a, please end your deliberations and sign the verdict form on the last page. If you answered "No" to this question and "Yes" to either Question 2 or Question 3, please end your deliberations and sign the verdict form on the last page. Otherwise, please proceed to Question 5.)

PLAINTIFF'S COMPARATIVE FAULT

5) Was Plaintiff negligent at the time of her accident?

Yes _____

No _____

(If you answered "Yes" to this question, proceed to Question 5a. If you answered "No" to this question, proceed to Question 7.)

a) Was Plaintiff's negligence a substantial factor in causing her injury?

Yes _____

No _____

(If you answered "Yes" to this question, proceed to Question 6. If you answered "No" to this question, proceed to Question 7.)

APPORTIONMENT

6) Please follow the instructions below and answer Questions 6a-6b, which ask you to assign percentages of responsibility for the April 18, 2011 accident. The total of the percentages you provide in answering Questions 6a-6b must equal 100%.

- a) Please state the percentage of responsibility for the April 18, 2011 accident that you assign to Plaintiff.

_____ %

(If you assigned more than 50% responsibility to Plaintiff, Crown cannot be liable. Please sign the verdict form on the last page and proceed to the courtroom. Otherwise, please proceed to Question 6b.)

- a) Please state the percentage of responsibility for the April 18, 2011 accident that you assign to Crown Equipment Corporation.

_____ %

(Proceed to Question 7.)

LOSS OF CONSORTIUM

7) Has Richard English suffered a loss of services and consortium from his wife, Plaintiff Patricia English, because of her injury?

Yes _____

No _____

(Proceed to Question 8.)

DAMAGES

- 8) State the total amount of damages, if any, incurred. If you decide not to make an award, insert the word "none" on the line.

Note that in arriving at the total, you must not consider your answers to the Questions above. Instead, you must simply report the total amount of damages.

\$ _____

(Report to the courtroom.)

SO FOUND this ____ day of June 2016.

Signature of Foreperson

(Your deliberations are over.)